

Public Comment
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2022 NAC Spring Virtual Meeting Public Comment

I am submitting these comments on behalf of the Coalition on Human Needs (CHN), an independent alliance of human service provider groups, faith organizations, policy experts, labor, civil rights and other advocacy organizations concerned with meeting the needs of people with low incomes. Children and people of color are among those disproportionately poor, and so their needs are a particular focus of CHN's members.

We are very concerned about the emerging evidence that the 2020 Census net undercount of young children is worse than in previous decades, with suggestive findings that the net undercount of young children of color is even worse. Therefore, we strongly support the Bureau's creation of a Cross-Directorate team on the undercount of young children as a very constructive step.

We encourage the Cross-Directorate team to assess the factors that most correlate with high levels of missed young children by creating a research plan to gauge substate areas where children were most likely to be missed and to identify reasons why children of color were missed. We urge the team to review ideas from the 2020 Census Task Force on the Young Child Undercount to identify means of improving the count that were not implemented in 2020 but that could improve outcomes in 2030. The Cross-Directorate team should consider such operational measures as more extensive mailings to targeted communities and development of procedures to ensure that enumerators have access to apartment complexes.

It is of particular importance that the Cross-Directorate team evaluate the use of administrative records to improve the accuracy of the count of young children for 2020, and to assess whether the use of such records will improve accuracy for Hispanic and Black children as well as White children.

Because the undercount of young children and of Hispanic and Black populations appears to be extremely high, we urge the Census Bureau to undertake research into why the response rate in predominantly Hispanic and Black tracts declined in 2020 and to release data about variations in coverage error by race and ethnicity, either for analysis by outside researchers, or, if that does not comply with privacy requirements, to do the analysis in-house.

The Census Bureau has shown in its recent publication that the use of the blended base can improve the accuracy of data for young children for purposes of distribution of federal funding; the Bureau should thoroughly investigate the use of the blended base to establish whether its use would improve the accuracy of the count of Black and Hispanic populations or other racial and ethnic groups compared with the use of the 2020 Census data.

The Bureau should engage external groups, sought through broad public outreach, beginning early in the 2030 Census planning process, building on its effort to involve a wide range of stakeholders in the 2020 Census process, and should incorporate the views and insights of the 2020 stakeholders in planning for 2030.

Thank you for the opportunity to provide these comments. If you need additional information, please contact me at dweinstein@chn.org.